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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**  
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13 LAURI VALJAKKA

14 *Plaintiff,*

15 v.

16 NETFLIX, INC.,

17 *Defendant.*  
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Case No.: 4:22-CV-01490-JST

**[PROPOSED] ORDER GRANTING  
NETFLIX, INC.'S ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
PLAINTIFF'S MATERIAL SHOULD  
BE SEALED**

On August 21, 2025, Defendant Netflix, Inc. (“Netflix”) filed an Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Sealing Motion”) relating to Netflix’s Motion for Summary Judgment. Netflix’s Motion for Summary Judgment references certain previously sealed documents containing Lauri Valjakka’s financial information and license agreements as well as Lauri Valjakka’s financial records and emails involving himself and/or his legal counsel (included hereto as Exhibits A-I to the Declaration of Rachael Lamkin in Support of this Motion)—all of which contain information that Plaintiff has designated as “Confidential” or “Highly Confidential Attorneys’ Eyes Only” under the Stipulated Protective Order entered in this action on July 25, 2022 (ECF No. 56) or obtained from AiPi, LLC (“AiPi”), Lauri Valjakka’s litigation funders, previously designated “confidential” under the same protective order as a part of the court-ordered forensic discovery in the United States District Court for the Eastern District of Virginia.

The Court having reviewed the evidence in support of the Administrative Sealing Motion, finds that the following constitutes sealable material under Local Rule 79-5:

<b><u>Document</u></b>	<b><u>Portions to be Considered to be Sealed</u></b>	<b><u>Designating Party</u></b>
Exhibit A (email from Eric Morehouse to Sally Fan dated June 12, 2023)	Entire document	AiPi designated “confidential”
Exhibit B (bank statement of CDN Licensing Oy dated April 29, 2022)	Entire document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit C (translated bank statement of CDN Licensing Oy dated July 30, 2022)	Entire document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit D (email from William Ramey to Eric Morehouse dated August 13, 2023)	Entire document	AiPi designated “confidential”
Exhibit E (email from Onni Hietlahti to Lauri Valjakka and Matti Sarahelmo)	Entire document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”

<u>Document</u>	<u>Portions to be Considered to be Sealed</u>	<u>Designating Party</u>
Exhibit F (email from Lauri Valjakka to Onni Hietlahti dated November 9, 2022)	Entire Document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit G (Bond agreement between CDN Licensing Oy and Scarabaeus Sacer Oy dated November 5, 2021)	Entire Document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit H (email from Onni Hietlahti to Lauri Valjakka and Matti Sarahelmo)	Entire Document	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”
Exhibit I (email from Erick Robinson to Eric Morehouse dated November 13, 2021)	Entire document	AiPi designated “confidential”
Netflix’s Motion for Summary Judgment	Highlighted portions containing party names to settlement and licensing agreements and any confidential terms	Plaintiff Lauri Valjakka designated “Highly Confidential Attorneys’ Eyes Only”

Therefore, IT IS HEREBY ORDERED that Defendant Netflix’s Administrative Sealing Motion is GRANTED. The unredacted version of Netflix’s Motion for Summary Judgment, and Exhibits A-I shall be filed under seal pursuant to L.R. 79-5(c).

**IT IS SO ORDERED.**

Dated:

By: \_\_\_\_\_  
Hon. Jon S. Tigar  
DISTRICT COURT JUDGE